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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER THEIR RESPONSES TO  
COURT'S QUESTIONS 1-2 AND 5-8 FOR  
FURTHER HEARING ON MOTION TO  
STRIKE ASSERTED TRADE SECRET  
NUMBER 96**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and  
7 Ottomotto, LLC’s Administrative Motion to File Under Their Responses to Court’s Questions 1-2 and  
8 5-8 for Further Hearing on Motion to Strike Asserted Trade Secret Number 96 (the “Administrative  
9 Motion”). The Administrative Motion seeks an order sealing highlighted portions of Uber’s  
10 Responses to Court’s Questions 1-2 and 5-8 for Further Hearing on Motion to Strike (“Uber’s  
11 Responses”), as well as the entirety of Exhibits A and B thereto.

12 3. The portions of Uber’s Responses marked in red boxes and the entirety of Exhibits A  
13 and B contain or refer to trade secret information, which Waymo seeks to seal.

14 4. Uber’s Responses (portions marked in red boxes in version filed herewith) and Exhibits  
15 A and B (entire documents) contain, reference, and/or describe Waymo’s asserted trade secrets or  
16 information that, from context, tends to disclose Waymo’s asserted secrets. The information Waymo  
17 seeks to seal includes the confidential design and functionality of Waymo’s proprietary autonomous  
18 vehicle system, including its LiDAR designs, which Waymo maintains as secret. I understand that  
19 these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are  
20 valuable to Waymo’s business (Dkt. 25-31). The public disclosure of this information would give  
21 Waymo’s competitors access to descriptions of the functionality or features of Waymo’s autonomous  
22 vehicle system. If such information were made public, I understand that Waymo’s competitive  
23 standing would be significantly harmed.

24 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Responses and  
25 Exhibits A and B that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on September 11, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC  
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.  
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12 By: /s/ Charles K. Verhoeven

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